

Exhibit E

Ranade, Amit

From: Ward, Darnella <Darnella.Ward@ctt.com>
Sent: Wednesday, September 25, 2024 2:52 PM
To: Ranade, Amit; Satre, Mallory
Cc: Daniel Bugbee; Frazier, Al; Gere, Tamorah; Laurie Thornton; Dominique Scalia; Eric Camm; Partridge, Brenda
Subject: RE: Ideal Murfreesboro - BFP Status Order

Follow Up Flag: Follow up
Flag Status: Flagged

[EXTERNAL] darnella.ward@ctt.com

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Correct, single asset BKs would not be sufficient and to consider insurance the entirety of the portfolio of assets and real estate, and creditors and claimants would have to be consolidated into one BK.

Thank you,

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From: Ranade, Amit <aranade@swlaw.com>
Sent: Wednesday, September 25, 2024 12:11 PM
To: Ward, Darnella <Darnella.Ward@ctt.com>; Satre, Mallory <msatre@swlaw.com>
Cc: Daniel Bugbee <dbugbee@lawdb.com>; Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>; Laurie Thornton <lthornton@lawdb.com>; Dominique Scalia <dscalia@lawdb.com>; Eric Camm <ericc@turning-point.com>; Partridge, Brenda <bpartridge@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

Darnella,

Understood. We are evaluating bankruptcy options, and the overall plan is to do something along these lines with respect to the balance of the portfolio that is still not in bankruptcy.

Is it your position that Fidelity will not insure this sales unless the entire portfolio is collapsed into the pending Ideal Property Investments LLC bankruptcy case or would it be sufficient to put single-asset entities (such as Ideal Murfreesboro LLC) into their own individual bankruptcy cases?

Please clarify.

Thanks,
Amit

Amit Ranade

O: 206.741.1404
aranade@swlaw.com

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From: Ward, Darnella <Darnella.Ward@ctt.com>
Sent: Wednesday, September 25, 2024 11:46 AM
To: Ranade, Amit <aranade@swlaw.com>; Satre, Mallory <msatre@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

[EXTERNAL] darnella.ward@ctt.com

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Amit:

As discussed, the Company has determined that it will not insure the TN transaction as it stands currently. There are several factors that leave open our risk and exposure. The key reasons are as follows:

1. RICO – e.g. The US District Court Case in NY
 - a. RICO allows the court to follow the money which leaves open the ability of the Court to pursue the property and wherever the funds go. We have taken into account that this was conditioned on getting a release from 352, the Plaintiff in the RICO case. This does not limit other parties who may be brought into this case.
 - b. It is unknown how the BK Court would handle the NY RICO case as to all the properties, and whether the BK Court would consider rulings of the NY RICO Court prior to or with regard to rulings on all the properties.
2. The BK
 - a. The BK does not seem to currently name the TN property nor the LLC owner. With any future BK plan or sales orders, the BK is unlikely to rule to confirm sale of the TN Property because the asset

would no longer be in the name of the LLC. As such, any exposure we would take on would continue to exist and not be resolved in the BK.

- b. If the TN Property is brought into the BK now prior to closing, then there would be an automatic stay and they would have to get a sales order from the BK.
3. The limited defense indemnity offered by the Receiver is not sufficient to cover this exposure, as the exact exposure cannot be calculated with the series of litigations, allegations, and victims/claimants. With regard to all of the Ryan Wear entities and the TN Property specifically, there is no way to lock down how many victims/creditors may exist and whether they have already been flushed out without doing an all encompassing BK.

The recommendation is to perform an all-encompassing BK wherein all assets, properties, entities, and creditors/victims are brought in to review for coverage. In this way the issues can be fully finalized and addressed such that exposure is minimize and we can evaluate insuring based on that.

Let me know if you have any questions.

Darnella

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From: Ranade, Amit <aranade@swlaw.com>
Sent: Wednesday, September 25, 2024 10:29 AM
To: Ward, Darnella <Darnella.Ward@ctt.com>; Satre, Mallory <msatre@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

Thanks—I will call you just after 11.

Amit Ranade

📞: 206.741.1404
aranade@swlaw.com

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From: Ward, Darnella <Darnella.Ward@ctt.com>
Sent: Wednesday, September 25, 2024 10:17 AM
To: Satre, Mallory <msatre@swlaw.com>; Ranade, Amit <aranade@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

[EXTERNAL] darnella.ward@ctt.com

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Thank you. Hi Amit:

I left you voicemail as I have heard back from underwriting on some additional issues that need to discuss as soon as possible.

Please give me a call at your earliest convenience. I will be on a call from 10:30-11 am. But I will be otherwise available.

Darnella

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From: Satre, Mallory <msatre@swlaw.com>
Sent: Wednesday, September 25, 2024 9:25 AM
To: Ward, Darnella <Darnella.Ward@ctt.com>; Ranade, Amit <aranade@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

Hi Darnella,

Here is that TN docket report. Thanks,

Mallory Satre

O: 206.741.1408
msatre@swlaw.com

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From: Ward, Darnella <Darnella.Ward@ctt.com>
Sent: Tuesday, September 24, 2024 4:41 PM
To: Satre, Mallory <msatre@swlaw.com>; Ranade, Amit <aranade@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

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Thanks, Mallory.

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From: Satre, Mallory <msatre@swlaw.com>
Sent: Tuesday, September 24, 2024 4:35 PM
To: Ward, Darnella <Darnella.Ward@ctt.com>; Ranade, Amit <aranade@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>; Gere, Tamorah <tgere@swlaw.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

Hi Darnella,

The TN Murfreesboro receivership (case #24CV-1033) is ancillary to the WA Murfreesboro receivership (case # 24-2-03751-31). The Washington court blessed the receiver's authority to commence ancillary receiverships within the WA appointment order, paragraph i (page 5); that authority is also given by RCW 7.60.270.

We will ask our local counsel for a docket report out of the TN matter. I've attached the WA and TN appointment orders, along with the TN sale order.

Just let us know if we can provide any further documents or information. Thanks,

Mallory

Mallory Satre

☎: 206.741.1408
msatre@swlaw.com

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From: Ward, Darnella <Darnella.Ward@ctt.com>
Sent: Tuesday, September 24, 2024 4:09 PM
To: Ranade, Amit <aranade@swlaw.com>; Satre, Mallory <msatre@swlaw.com>
Cc: Frazier, Al <Al.Frazier@fnf.com>
Subject: RE: Ideal Murfreesboro - BFP Status Order

[EXTERNAL] darnella.ward@ctt.com

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Amit/Al:

I am working thought some questions as relates to the approval for this portfolio and TN sale. Sorry if you provided this already, but can you please provide the following information as soon as possible:

1. The WA receivership under case # 24-2-03751-31 had a stay as to commencement of other actions. Did the Receiver obtain a lift of stay and approval of the domestication action in TN for case #24CV-1033, or a post-approval of the court for the domestication and sale of the property through the TN court?
2. TN Case 24CV-1033
 - a. Please provide a court docket report
 - b. Please provide entered order granting petition for appointment of Ancillary Receiver

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